

KPMG Consulting – Verizon Responses regarding New Jersey Exception Report #5

Exception #:	5
Component:	KPMG Consulting observed several instances where Verizon’s systems prevented orders submitted via EDI from flowing through in accordance with Verizon documentation.
Domain:	POP
Date Uncovered by KPMG:	11/06/00
Date VERIZON Received:	11/06/00
Date of initial VERIZON Response:	11/30/00
KPMG Consulting Summary Statement	Inaccurate or incomplete flow through processing due to system related issues might impede a CLEC’s ability to anticipate the confirmation of service orders.
KPMG Consulting Response:	<p><u>KPMG Consulting’s 12/11/00 Reply to Verizon’s 11/30/00 Response</u></p> <p>KPMG requires that Verizon provide specific details, for each of the PONs raised in the exception, on the “data mismatch or constraint” that caused these PONs to be routed to the TISOC for manual intervention. The response that Verizon provided on PONs 1-14 does not allow KPMG to completely analyze the issue and determine whether or not the evaluation criteria is satisfied.</p> <p>The response that Verizon provided on PONs 15-17 did allow KPMG to analyze the issue further.</p> <p>PONS 15-16</p> <p>PONS 15-16 consist of test case 069021 instances 6 and 7, AA version for both instances. These two PONS were both submitted on 9/29/2000 at 10:55 AM and both received local service confirmations on 9/29/2000 at 10:56 AM.</p> <p>Test case 069021 reads: <i>Migrate 2 auxiliary lines of a VZ-NJ 4-lines business customer to CLEC UNE loop. Submit DL to list with the customer's new KPMG TN.</i></p> <p>On 9/29/00, Verizon’s most current generic flow through documentation stated that a <i>partial migration of a Loop with a new main straight line listing (taking the billing telephone number= level 2) and taking a non billing telephone number is level 4 for less than 51 loops.</i></p> <p>Verizon has since updated their documentation to reflect that non BTN partial migrations for UNE loops are flow through. Verizon’s language above is misleading in the fact that their statement implies that Verizon correctly processed these two PONs based on their documentation. KPMG</p>

Consulting assigns flow through expectations based on the most current flow through information at the time of submission. At the time of submission, Verizon's documentation did not reflect the actual flow through nature of the PON.

PON 17

PON 17 consist of test case 019031 instance 2, AA version. This PON was submitted on 9/25/2000 at 5:04 PM and received a local service confirmation on 9/25/2000 at 5:11 PM.

Test case 019031 reads: *Migrate as is of a CLEC resale 1-line business to another CLEC resale. Note: this is a CLEC to CLEC migration.*

This PON was presented to Verizon during the observation process and Verizon responded that the flow through problem that KPMG Consulting experienced was due to system related problems. KPMG Consulting subsequently included this PON in the flow through exception that covered all system related issues. Verizon then conducted additional research and attributed the issue to a KPMG Consulting input error. As a result of Verizon's response KPMG Consulting researched PON 17 further and agrees with Verizon. Therefore, KPMG Consulting will remove this PON from the exception.

VERIZON Response:

11/30/00 Response to Exception

On November 17th, KPMG identified 17 order transactions that did not flow through in accordance with Verizon's documentation. Two types of conditions were identified – orders that did not flow and should have, and orders that did flow through and were not expected to. For the 17 PONs KPMG identified, Verizon followed the appropriate process and procedures to address the orders and then send the confirmations to KPMG.

The first set of PONs (1-14) did not flow through Verizon processing for a variety of reasons. Verizon's systems are designed to support quality order entry. In the event of a data mismatch or constraint, the TISOC review process promptly addresses any issue and supplies confirmations to the CLECs. Verizon is constantly working to improve flow through by addressing specific conditions that impact the level 5 flow through orders. For example, PONs 7 and 8 were resolved with the October release. Verizon continues to implement system enhancements to increase the percentage of flow through orders.

KPMG identified the second set of PONS (15-17) as 'not expected to flow through at level 5'. Verizon's investigation indicates that the 3 PONs correctly processed according to Verizon's flow through documentation, and therefore, there is no error.